

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

ROSE L. EPPERSON,
Individually
and as class representative for all similarly
situated persons,

Plaintiff,

v.

INTERNATIONAL PAPER COMPANY,
KERR-MCGEE
CHEMICAL CORPORATION,
KERR-MCGEE OPERATING
CORPORATION, and BNSF
RAILWAY COMPANY,

Defendants.

Civil Action No. 2:20-CV-00053

Judge James D. Cain, Jr.

**DECLARATION OF
JASON ROTSTEIN**

I, Jason Rotstein, declare as follows:

1. I am an associate attorney of the firm Glenn Agre Bergman & Fuentes LLP, attorneys for plaintiff Rose L. Epperson. I have personal knowledge of the contents of this declaration.

2. I provide this declaration in further support of plaintiff's Motion to Compel the Deposition of Emily W. Lee, dated September 19, 2025.

3. In compliance with LR7.4.1, plaintiff met and conferred with defendant International Paper Company ("IP") on the discovery issues in this motion including but not limited to the dates June 5, 2025, June 25, 2025, and August 27, 2025. The parties further corresponded about these issues via email. The parties have been unable to resolve the issues without court intervention.

4. Attached hereto as **Exhibit 1** is a true and correct copy of plaintiff's notice of deposition served on IP on May 30, 2025.

5. Attached hereto as **Exhibit 2** is a true and correct copy of email correspondence between plaintiff counsel and IP counsel, dated September 8, 2025.

6. Attached hereto as **Exhibit 3** is a true and correct copy of email correspondence between IP counsel and plaintiff counsel, dated September 9, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on this 19th day of September, 2025.

/s/ Jason Rotstein
Jason Rotstein